FILED IN DISTRICT COURT McClain County, Oklahoma

IN THE DISTRICT COURT OF MCCLAIN COUNTY STATE OF OKLAHOMA

FEB 22 2013

DONITA ARBUCKLE,)	Lynda Baker, Court Clerk
Plaintiff,)	by,Deputy
v. PROGRESSIVE NORTHERN INSURANCE CO.,) Case No.: CJ-2)))	2013-5
Defendant.) PETITION	

COMES NOW the Plaintiff, Donita Arbuckle, and for her claim against the Defendant, Progressive Northern Insurance Company (hereinafter "Progressive"), hereby alleges and states:

- I. On or about August 9, 2011, Plaintiff was involved in a motor vehicle collision with Seth Watson. The collision occurred in Blanchard, McClain County, Oklahoma.
- 2. The aforementioned collision was a direct result of the negligence of Seth Watson in that he failed to exercise reasonable care in operating his motor vehicle.
- 3. As a direct result of said negligence, the Plaintiff sustained personal injuries resulting in the following elements of damage, both past and future: pain, suffering, disability, medical expenses, loss of income, and loss of quality of and enjoyment of life.
- 4. At the time of the collision with Plaintiff, Seth Watson was without liability insurance sufficient to compensate Plaintiff for her claim for damages.
- 5. Furthermore, at the time of the collision, a policy of insurance containing uninsured or underinsured motorist coverage was in full force and effect between Plaintiff and Defendant Progressive. This policy of insurance provides a total of \$25,000 in underinsured motorist benefits, and Plaintiff is entitled to collect said benefits from Defendant.
 - 6. Defendant is liable to the Plaintiff for the Plaintiff's damages under this provision.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays for judgment against the Defendant in an amount in excess of \$75,000, for her actual damages, for punitive damages, for her costs, for applicable interest thereon, and for all other just and equitable relief to which she may be entitled.

Respectfully submitted,

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